

April 22, 2015

Mr. Jeff Jordan
Assistant General Counsel
Complaints Examination and Legal Administration
Federal Election Commission
Washington, DC 20436

2015 APR 30 11:18

OFFICE

Dear Mr. Jordan:

Our office is in receipt of the complaint filed with your office alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). It is our understanding this matter is under review and is numbered MUR 6931. Thank you for the opportunity to respond to this complaint in writing.

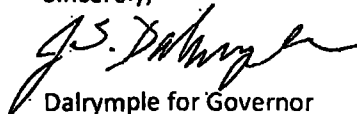
The complaint alleges that contributions received, specifically those received from Mr. John Pfeffer in the amount of \$1,000 in October of 2012 and from Mr. Ledohowski in the amount of \$2500 in July of 2012 were made in violation of the "Act". It is our position that no action should be taken in regards to this complaint for the following reasons.

In reviewing our files, we examined the \$1000 check received from Mr. J. L. Pfeffer. A copy of that check is enclosed. As you can see, the address on the check is Nashville, TN 37220. We believe that Mr Pfeffer is a citizen of the United States. The London address in the report filed with the Secretary of State in January of 2013 was apparently an updated address from an address service.

Although the check from Mr. Ledohowski carried a Winnipeg address, the campaign was not aware of any violation at the time the funds were received. All campaign contributions were properly reported to the North Dakota Secretary of State without any alerted violations. Citizenship of the party making this particular contribution was never called into question at the time the contribution was reported as this individual is known to have business activities in both North Dakota and Manitoba. If in fact this particular contribution was in violation of the "Act", it was an inadvertent violation resulting from the campaign's reliance on state law.

It was never the intent of the Dalrymple for Governor campaign to accept any contribution which may violate election laws. However because of the questions raised, the contribution from Mr. Ledohowski has been returned in full based solely on the possibility it could be found non-compliant (copy of check draft enclosed).

Sincerely,



Dalrymple for Governor